

# **EXHIBIT “A”**

WILENTZ, GOLDMAN & SPITZER  
A Professional Corporation  
Giovanni Anzalone, Esq.  
Attorney ID No.: 014851996  
90 Woodbridge Center Drive  
Post Office Box 10  
Woodbridge, New Jersey 07095  
(732) 636-8000  
Attorneys for Plaintiff

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
SOMERSET COUNTY  
DOCKET NO.

-----X  
KEVIN KING, :  
: :  
Plaintiff, : : Civil Action  
v. : :  
RICHARD GLEN FOY, : :  
KLAPEC TRUCKING COMPANY, : :  
JOHN DOES 1-40 (fictitious : :  
names, real names unknown), : :  
and ABC CORP. 1-40 : :  
(fictitious entities, real : :  
names unknown), : :  
: :  
Defendants. : :  
: :  
-----X

Plaintiff, Kevin King, residing in the township of  
Raritan, County of Somerset, and State of New Jersey, by way of  
Complaint against the Defendants says:

FIRST COUNT

1. On or about September 14, 2018, the plaintiff, Kevin King was the operator of a motor vehicle that was traveling south on Route 206 approaching the intersection of Hillsborough Road wherein said intersection was controlled by a traffic signal at which time a green traffic signal was present for traffic traveling on Route 206, in the township of Hillsborough, Somerset County, New Jersey.

2. At the above-referenced time and date, the defendant(s), Richard Glen Foy and/or John Does 1-3 was the operator of a tractor-trailer wherein same was either owned by said defendant and/or defendant, Klapiec Trucking Company and/or John Does 4-10 and/or ABC Corp. 1-5. The aforementioned commercial vehicle (tractor-trailer) was traveling east on Hillsborough Road and disregarded a red traffic signal and stop line markers and attempted to make a right turn onto the northbound lane of Route 206 at which time said commercial vehicle entered into the southbound lane of Route 206 and collided head-on with the vehicle operated by the plaintiff, Kevin King, in the township of Hillsborough, Somerset County and State of New Jersey.

3. At the time and date referenced above, defendant(s) carelessly, negligently and/or recklessly operated

their motor vehicle, negligently failed to properly maintain his/her vehicle, operated his/her vehicle in an unsafe and/or careless manner, failed to provide a safe travel distance between the respective motor vehicles, failed to observe traffic lanes, disregarded roadway traffic lines, failed to observe a traffic signal, failed to make adequate observations of traffic, failed to maintain his lane of travel, was traveling at a speed in excess for the traffic/road conditions, failed to yield to the right of way, failed to take evasive action, failed to maintain their vehicle a safe and proper distance from plaintiff's vehicle, and did so otherwise negligently operate and/or maintain his/her motor vehicle(s) as to cause a collision between the aforementioned motor vehicles.

4. As a direct and proximate result of the negligence of the defendants, the Plaintiff, Kevin King, was seriously and permanently injured, has undergone numerous surgical procedures, will require further medical care in the form of surgical procedures, has sustained significant scarring and disfigurement to multiple areas of his body, suffered great pain which may continue for the remainder of his life, and was and in the future will be prevented from attending to his normal business.

WHEREFORE, Plaintiff, Kevin King, demands judgment against the defendants awarding damages, interest plus costs of suit on this Count.

SECOND COUNT

1. The allegations contained in the First Count of this Complaint are repeated and realleged as if fully set forth herein.

2. At the above-referenced time and place, defendant, Richard Glen Foy and/or John Does 10-20 was employed by defendant, Klapec Trucking Company and was operating the aforementioned commercial vehicle during the course of employment and/or as a representative and/or agent of defendant, Klapec Trucking Company and/or ABC Corp. 1-10.

3. At the time and date referenced above, and prior thereto, defendant, Klapec Trucking Company and/or ABC Corp 1-10 negligently hired and/or retained defendant, Richard Glen Foy and/or John Does 1-20.

4. At the time and date referenced above, defendants and/or defendant's agents, carelessly, negligently and/or recklessly operated their motor vehicles, failed to obey controlling traffic signs and/or roadway signs, failed to yield to other traffic, negligently failed to make adequate

observations of traffic, failed to yield to the right of way of Plaintiff's vehicle, failed to observe a traffic signal, failed to properly maintain their vehicle(s), failed to take evasive action, failed to provide a safe travel distance between the respective motor vehicles, failed to maintain their lane, failed to observe traffic lane(s), traveled at an unsafe speed that exceeded roadway and/or weather conditions and did so otherwise negligently operate and/or maintain his/her motor vehicle(s) as to cause a collision between the aforementioned motor vehicles.

5. As a direct and proximate result of the negligence of the defendant(s), the Plaintiff, Kevin King, was seriously and permanently injured, has undergone numerous surgical procedures, will require further medical care in the form of surgical procedures, has sustained significant scarring and disfigurement to multiple areas of his body, suffered great pain which may continue for the remainder of his life, and was and in the future will be prevented from attending to her normal business.

WHEREFORE, Plaintiff, Kevin King, demands judgment against the defendants awarding damages, interest plus costs of suit on this Count.

**THIRD COUNT**

1. The allegations contained in the First and Second Counts of the Complaint are repeated and realleged as if fully set forth herein.

2. Defendants, John Does 1-40 and ABC Corp. 1-40 are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with and/or independently of the named defendants, owned, operated and/or maintained the vehicle(s), were operators of the vehicle(s) upon the aforesaid roadway(s), and/or employed or otherwise engaged as agents of any of the individual and/or corporate defendants, and whose negligence contributed to the motor vehicle accident(s) on September 14, 2018 at Route 206 and Hillsborough Road, in the Township of Hillsborough, County of Somerset, New Jersey, resulting in Plaintiff, Kevin King's injuries and damages.

3. At the time referenced above, defendants John Does 1-40 and/or ABC Corp. 1-40, defendants and/or defendant's agents, carelessly, negligently and/or recklessly operated their motor vehicles, failed to obey controlling traffic signs and/or roadway signs, failed to yield to other traffic, negligently failed to make adequate observations of traffic, failed to yield

to the right of way of Plaintiff's vehicle, failed to observe a traffic signal, failed to properly maintain their vehicle(s), failed to take evasive action, failed to provide a safe travel distance between the respective motor vehicles, failed to maintain their lane, failed to observe traffic lane(s), traveled at an unsafe speed that exceeded roadway and/or weather conditions and did so otherwise negligently operate and/or maintain his/her motor vehicle(s) as to cause a collision between the aforementioned motor vehicles.

4. As a direct and proximate result of the negligence of the defendant(s), the Plaintiff, Kevin King, was seriously and permanently injured, has undergone numerous surgical procedures, will require further medical care in the form of surgical procedures, has sustained significant scarring and disfigurement to multiple areas of his body, suffered great pain which may continue for the remainder of his life, and was and in the future will be prevented from attending to her normal business.

WHEREFORE, Plaintiff, Kevin King, demands judgment against the defendants awarding damages, interest plus costs of suit on this Count.

WILENTZ, GOLDMAN & SPITZER  
A Professional Association  
Attorneys for Plaintiff  
By:   
GIOVANNI ANZALONE

Dated: September 4, 2020

**JURY DEMAND**

Plaintiff demands a trial by jury as to all issues to triable.

**CERTIFICATION**

This matter is not the subject of any other litigation or arbitration proceeding. Further, Plaintiff's counsel is not presently aware of the identity of any other individuals who should be joined as parties to this action.

**DESIGNATION OF TRIAL COUNSEL**

Please take notice that pursuant to Rule 4:25-4, Plaintiff hereby designates Giovanni Anzalone, Esq. as trial counsel in the within matter.

  
GIOVANNI ANZALONE

Dated: September 4, 2020

## Civil Case Information Statement

### Case Details: SOMERSET | Civil Part Docket# L-001031-20

Case Caption: KING KEVIN VS FOY RICHARD	Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)
Case Initiation Date: 09/04/2020	Document Type: Complaint with Jury Demand
Attorney Name: GIOVANNI ANZALONE	Jury Demand: YES - 6 JURORS
Firm Name: WILENTZ GOLDMAN & SPITZER	Is this a professional malpractice case? NO
Address: 90 WOODBRIDGE CENTER DR STE 900 PO BOX 10	Related cases pending: NO
WOODBRIDGE NJ 070950958	If yes, list docket numbers:
Phone: 7326368000	Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO
Name of Party: PLAINTIFF : King, Kevin	Are sexual abuse claims alleged by: Kevin King? NO
Name of Defendant's Primary Insurance Company (if known): Unknown	

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

09/04/2020  
Dated

/s/ GIOVANNI ANZALONE  
Signed